

## REMARKS

Regarding the Claims

Claims 1-74 remain in this application. Claims 31 and 41-42 have been cancelled, and Claims 1-29, 32-39, 43-62, 64, 66, 68, 70 and 72-74 have been amended in the present paper. Also, new Claims 75 and 76 have been added. Applicants respectfully submit that these amendments and new claims are all fully supported by the specification. Remarks regarding these amendments to address the concerns raised by the Examiner in the current Office Action are presented immediately hereinafter.

Regarding the 35 U.S.C. §102 Rejections over Anderson et al.

In the outstanding Office Action, the Examiner rejected remaining Claims 1-21, 23-27, 32-40, 62-63, 68 and 73-74 under 35 U.S.C. §102(b) as being anticipated by Anderson et al. (U.S. Pat. No. 5,832,227; hereinafter, Anderson). In particular, regarding Claims 1, 32, 35, 41, 63, 73 and 74, the Examiner asserts that Anderson discloses:

- after the e-mail message has been originated by an originating user of the first user group, directing the e-mail message onto an e-mail enhancement path (column 2, lines 35-37, 45-56; column 9, lines 64-65);
- adding additional content to said e-mail message using the e-mail enhancement path to produce an enhanced e-mail message (column 2, lines 45-57); and
- thereafter, directing the enhanced e-mail message from the e-mail enhancement path to the intended recipient (column 4, lines 38-41; column 5, lines 15-18).

Applicants respectfully disagree with the Examiner's assertion at least for reasons discussed immediately hereinafter.

To anticipate a claim, the reference must teach every element of the claim and "the identical invention must be shown in as complete detail as is contained in the ... claim." MPEP 2131 citing *Verdegaal Bros. V. Union Oil Co. of California*, 814 F.2d 628, 2 USPQ2d 1051 (Fed. Cir. 1987) and *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 9 USPQ2d 1913 (Fed. Cir. 1989).

First contemplating Claim 1, Applicants' Claim 1, as amended, requires the following elements:

In a multi-user e-mail messaging system interfaced through the Internet and including at least a first user group sharing at least a first server, which first server is, in turn, interfaced to the Internet such that any user of the first user group may send an e-mail message for transfer to an intended recipient selected as at least one of (i) another user in the first user group and (ii) a remote user interfaced to the Internet by a connection other than said first server, a method comprising:

- after said e-mail message has been originated by an originating user of the first user group, directing the e-mail message onto an e-mail enhancement path;
- adding additional *rich media* content to said e-mail message using the e-mail enhancement path to produce an enhanced e-mail message; and
- thereafter, directing the enhanced e-mail message from the e-mail enhancement path to the intended recipient. [emphasis supplied]

Applicants respectfully submit that Anderson does not teach every element of Claim 1, as will be discussed in detail immediately hereinafter.

Each one of the passages cited by the Examiner regarding the rejection of Claim 1 is in turn considered. The Examiner relies upon cited passages at column 2, lines 35-37, 45-56; and column 9, lines 64-65 of Anderson for disclosure of the limitation of, after the e-mail message has been originated by an originating user of the first user group, directing the e-mail message onto an e-mail enhancement path. Applicants respectfully submit that, column 2, lines 35-37 of Anderson is simply referring to the general concept of directing e-mail outside of a given secure network or between secure networks. Furthermore, in this cited passage, Anderson does not mention or suggest in any way the directing of an e-mail message to an enhancement path, as provided in Claim 1. As indicated in the present application (e.g., in paragraphs [0070] and [0240]), the e-mail enhancement path as understood in the present application refers to an outbound message routing path through which selective addition of rich media content is performed. The enhancement path of the present invention is defined to include 1) a first process containing a routing application, and 2) a second process containing a processing application for selective addition of rich media content to outbound messages. Moreover, Claim 1 has been amended to specify that the additional content added to produce the enhanced e-mail message is rich media. By rich media content, as described in paragraph [0003] of the present application, for example, Applicants refer to any combination of images, video, audio, formatting, animation, HTML, programmatic scripting and other functionality that can be delivered through a Web browser application. Applicants believe that Web browser applications, and therefore rich media, did not exist at the time of Anderson. Therefore, it is respectfully submitted that Anderson does not disclose or suggest in any way that communication of an e-mail message outside of a secure network or between secure networks includes such function of the enhancement path for the selective addition of rich media content, as provided in Claim 1.

Also, column 2, lines 45-56 of Anderson mentions security problems that may be present within a secure network on untrusted computer devices. In particular, Anderson mentions a mail routing configuration file that sends messages directly to the gateway without authorization, or adds *unauthorized or unexpected* headers. In other words, the passage cited is generally concerned with the actions of a compromised mail routing configuration file as used, for instance, in common mail router applications such as sendmail. Applicants respectfully submit that the present cited passage is a description by Anderson of a *problem* for which Anderson is providing a solution; namely the problem of preventing emails from being modified. It is respectfully submitted that the present cited passage merely provides an unsupported suggestion of this problem without any teaching, disclosure or reasonable suggestion of how a message might be modified, and that this unsupported, naked suggestion is not a part of Anderson's invention. Clearly, this passage is not part of what Anderson is teaching in the context of the asserted invention. For this reason, it is respectfully submitted that any reliance on this passage is inappropriate, serving to take the subject suggestion out of context and in a way that is not consistent with what the Anderson reference fairly teaches, as a whole. In fact, the intention of Anderson as a whole is to prevent the modification of the body of an e-mail message when the e-mail message is directed outside of a secure network. It is respectfully submitted that claim 1 is allowable over Anderson for this reason standing on its own, however, there are additional reasons which are considered to compel the patentability of claim 1 over Anderson, as will be discussed below.

For example, even if it were assumed to be reasonable to rely on the aforesubscribed unsupported suggestion in Anderson, Applicants believe that, at the time of Anderson, a mail routing configuration file was capable of effecting *text* modifications; not the addition of additional *rich* media content, as provided in amended Claim 1. Consequently, Applicants respectfully submit that this passage does not teach, disclose or suggest in any reasonable way the use of an enhancement path for the addition of rich media content to e-mail messages, as described in detail in the present application and required in Claim 1, as amended.

Furthermore, column 9, lines 64-65 of Anderson is a description of a portion of a message header which represents a user defined classification, assumedly referring to the "user determined message or document security classification" as mentioned in Claim 9 and column 9 line 57 of Anderson. Applicants respectfully submit that the present passage does not disclose or suggest in any way the directing of an originated e-mail message onto an e-mail enhancement path for the addition of rich media content.

Continuing to consider Claim 1, the Examiner further relies upon the aforesubscribed column 2, lines 45-57 of Anderson to teach the addition of additional content to the e-mail message using the e-mail enhancement path to produce an enhanced e-mail message. This passage has already been discussed in detail above, and it is respectfully submitted that, in the cited passage, Anderson does not teach or suggest in any way the production of an enhanced e-mail message using the e-mail enhancement path, as provided in the present invention (e.g., in paragraphs [0068] and [0070] of the present application) and in Claim 1.

Still referring to the Examiner's rejection of Claim 1, the Examiner relies upon column 4, lines 38-41 and column 5 lines 15-18 of Anderson for the teaching of the limitation of directing the enhanced e-mail message from the e-mail enhancement path to the intended recipient. Applicants respectfully submit that column 4, lines 38-41 of Anderson, in and of itself, is merely a mention of the physical path of an e-mail message from a source to a destination. Applicants note that the passage in question is essentially a brief description of FIG. 1 of Anderson. FIG. 1 of Anderson shows the message path of an outbound e-mail message, including a diversion of the outbound e-mail message to a sealer and a potential diversion of a copy of the outbound e-mail message to an audit machine. It is respectfully submitted that neither the cited passage at column 4, lines 38-41 nor FIG. 1 of Anderson discloses or suggests in any way the provision of an enhancement path to add additional content to the outgoing e-mail message so as to provide an enhanced e-mail message for delivery to the intended recipient, as recited in Claim 1. Further, while column 5, lines 15-18 of Anderson mentions that the sendmail program refers to its configuration file in order to process the e-mail message so as to route the e-mail message "appropriately for its destination," Applicants respectfully submit that the passage cited refers only to the normal e-mail routing in sendmail, which does not perform any enhancement function as understood in the present application.

As a general reflection, Applicants submit that the main intention of Anderson is concerned with message content verification and security; that is, verifying that a given e-mail message does not contain secure information, attaching a seal to the message, then only allowing messages stamped with such a seal through the gateway to be released outside of the secure network. For example, while Anderson mentions the possibility of surreptitious addition and modification of an outbound e-mail message (column 2, lines 44-61 of Anderson), the method of Anderson provides the addition of a seal in order to ensure that the contents of the outbound e-mail message, once verified and sealed, is not modified (e.g., column 3, lines 38-42 of Anderson). It is respectfully submitted that the aim of the sealing mechanism of Anderson is that the e-mail message, once originated by the source, is not modified but kept intact without modification, addition or alteration of the message contents.

Applicants respectfully submit that nowhere does Anderson teach the modification of the original message by the addition of additional rich media content to produce an enhanced e-mail message for delivery to the intended recipient. In fact, Anderson arguably teaches away from the enhancing of e-mail messages, since the aim of the method of Anderson is to ensure that the content of a message sent by a source within the secure network is the same as the content of the resulting message received at the message destination (e.g., column 3, lines 9-14). That is, Applicants respectfully submit that Anderson essentially teaches away from the enhancement of e-mail message content, as taught by the present application and provided in the claims.

While Applicants acknowledge that a generic e-mail message delivery system and mail routing application (e.g., sendmail) generally directs an e-mail message from a source to a destination, it is respectfully submitted that the cited passages do not provide teachings to the additional limitations taught by amended Claim 1, namely the directing of the e-mail message onto the e-mail enhancement path and adding additional rich media content to the e-mail message using the e-mail enhancement path to produce an enhanced e-mail message. Actually, in Applicants' belief, rich media content was not commonly available at the time of Anderson because Web browser applications, through which rich media content is deliverable, did not exist at the time of Anderson.

Still considering Claim 1, Claim 1 has been further amended to correct minor editorial problems. In particular, the use of the word "step" has been eliminated in order to clarify the actions performed in the claimed method. Applicants respectfully submit that this amendment is merely correction of formal matters and, therefore, does not constitute an addition of new material and do not change the scope of the claim. Therefore, it is respectfully submitted that nowhere does Anderson disclose the combination of features disclosed in Claim 1, namely the request for additional content by the originating user or the administrator of the originating user group resulting in the production of an enhanced e-mail message including additional rich media content not present in the e-mail message as originated. Accordingly, in light of at least the above arguments, Applicants respectfully submit that Claim 1, as amended, overcomes the art of record.

Claims 2-27, as amended, each depend either directly or indirectly from and therefore include the limitations of amended claim 1. Accordingly, it is respectfully submitted that each of these claims is also patentable over the art of record for at least the reasons set forth above with respect to claim 1. Further, each of these dependent claims places additional limitations on their parent and intermediate claims which, when considered in light of claim 1, further distinguish the claimed invention from the art of record.

For example, Claim 2 provides that directing the e-mail message to the e-mail enhancement path includes receiving the e-mail message at the first server, which is shared by at least a first user group. Regarding Claim 2, the Examiner additionally states that Anderson also discloses:

a first auxiliary server for directing the e-mail message to a first location after said e-mail message has been placed en route to the intended recipient (figure 1, column 4, lines 38-41, column 5, lines 15-18); and

at the first location, a second auxiliary server for adding additional content to said e-mail message to produce an enhanced e-mail message and, thereafter, for directing the enhanced e-mail message to the intended recipient (figure 1, column 4, lines 12-15, column 5, lines 40-43).

Applicants respectfully disagree with the Examiner's statements for at least the following reasons.

Certain excerpts from Anderson (namely, FIG. 1, column 4, lines 38-41, and column 5, lines 15-18), currently cited against Claim 2, have been discussed above with regards to the limitations provided in Claim 1. Particularly regarding these previously discussed, cited passages from Anderson, in view of Claim 2, FIG. 1 and column 4, lines 38-41, merely mention the outline of an e-mail message delivery system for directing an e-mail message from a source to a destination, while column 5, lines 15-18, refers simply to the normal mail routing function of sendmail, which refers to the settings in the sendmail configuration file in order to process an e-mail message. That is, these cited passages do not provide for the direction of the e-mail message to an e-mail enhancement path for the addition of additional content to an e-mail message in order to produce an enhanced e-mail message as described in the present application. Such a procedure is described in detail in the present application at, for example, paragraphs [0079], [0081] and [0240].

Regarding the additional passages cited by the Examiner in the discussion of Claim 2, it is respectfully submitted that column 4, lines 12-15 of Anderson refers to the error checking mechanism invoked when a message seal is altered or is erroneous (that is, the invocation of "error and audit procedures", meaning that the gateway audits then rejects the message with the broken message seal). In other words, this cited passage refers to a situation in which an erroneous message is *prevented from* being directed to the intended recipient. Therefore, Applicants respectfully submit that this cited passage does not disclose the limitations as provided in amended Claim 2.

Also, column 5, lines 40-43, of Anderson refers to insertions in the message header for enabling sendmail to detect whether or not a given e-mail message has been sealed. It is respectfully submitted that such insertions into the message header do not amount to the enhancing of an e-mail message for the production of an enhanced e-mail message, as described in detail in the present application. Applicants respectfully submit that the present cited passage does not provide for the addition of additional content to the e-mail message to produce an enhanced e-mail message, as provided by the present invention and recited in amended Claim 2.

As another example, Claim 7 provides for parsing and temporarily storing the originating user and intended recipient information in a designated file separate from the e-mail message. Such a procedure is described in the present application in, for example, paragraph [0174]. The Examiner asserts that Anderson discloses such a procedure in column 5, lines 11-18, and column 9, lines 60-67. Applicants respectfully traverse. The passage at column 5, lines 11-18 of Anderson refer specifically to the manner in which sendmail refers to its configuration file during the processing of e-mail messages. As shown, for example, in column 6, lines 5-16 of Anderson, the configuration file for sendmail merely contains rules regarding the processing of e-mail messages, and sendmail refers to these rules during the routing of the e-mail message. That is, the sendmail configuration file does not serve as temporary storage of originating user or intended recipient information, as provided by amended Claim 7.

As still another example, Claim 8 provides for inactivating the originating user and intended recipient information contained in the header, and adding an alternate header section containing active information regarding an alternate sender and an alternate message recipient. Such a procedure is described in the present application in, for example, FIG. 23 and paragraph [0134]. The Examiner states that Anderson teaches such a procedure in column 10, lines 1-15, and column 5, lines 39-47. Applicants respectfully disagree with the Examiner's statement. The passage at column 10, lines 1-15 of Anderson refers to situations in which the interface to the sealing device may prohibit certain e-mail messages from reaching the sealing device, in which case the trusted sealing device is prohibited from sending a seal

to the interface. Furthermore, the other passage at column 5, lines 39-47 refers to the addition of extra headers into the e-mail message in order to indicate whether or not that message has been sealed, with the provision that the marker may be removed before message delivery. Although the passage in question mentions that the marker may be added "to the message's destination address before it was sent to sealconnect", it is respectfully submitted that there is no mention of inactivating the originating user and intended recipient information in the header, and adding an alternate header section containing active information regarding an alternate sender and an alternate message recipient, as provided in Claim 8. That is, Anderson seems to indicate a validation of data specific to the sealing process, but does not address the routing or re-writing of header names. Therefore, Applicants respectfully submit that the art of record does not teach the present invention as recited in amended Claim 8.

As another example, Claim 9 provides for inactivating the information regarding the originating user and intended recipient contained in the header section by adding a predetermined prefix to the originating user and intended recipient information contained in the header section. Such a procedure is described in the present application in, for example, FIG. 11 and paragraph [0133]. The Examiner asserts that Anderson discloses such a procedure in column 10, lines 1-2. Applicants respectfully traverse. The passage cited by the Examiner contains a description of an extra header that may be inserted into the message along with the seal. In particular, column 10, lines 1-2 describes a header item "X-Time: The time the message was sealed". That is, only the header *value* is modified; not the header *name* as taught in the present application. It is respectfully submitted that such a header insertion does not provide the inactivation of the header information regarding the originating user and intended recipient by adding a predetermined prefix to the originating user and intended recipient information, as provided by amended Claim 9.

As yet another example, Claim 13 provides for directing the e-mail message onto the e-mail enhancement path including adding a request for additional content to the e-mail message. The Examiner states that Anderson discloses such a procedure in column 3, lines 5-17. Applicants respectfully traverse. The cited passage refers to the creation and attachment of a seal to a particular e-mail message, thereby *preventing* the addition of additional content. In fact, Anderson describes the seal as being such that "changes to the message should invalidate any existing seal" (column 3, lines 13-14), thereby invoking the "error and audit procedures" (column 4 lines 12-16). Applicants respectfully submit that nowhere does Anderson disclose the adding of a request for additional content (i.e., rich media as defined in, for instance, paragraphs [0003] and [0078] of the present application) to a given message in order to produce an enhanced message (e.g., as described in paragraph [0068] of the present application). It is respectfully submitted that the cited passages gives no mention of the addition of a request for additional content to produce an enhanced e-mail message, as provided by Claim 13 as amended.

As still another example, Claim 24 provides for inserting one or more reference tags into said e-mail message by adding one or more of said reference tags to the e-mail message outside of the header section, which contains information regarding the originating user and the intended recipient. The Examiner states that Anderson discloses such a procedure in column 10, lines 54-67. Applicants respectfully disagree with the Examiner. The passage cited simply states that such headers may *not* exist in the header section of the message, and does not specify that such information may be present in the *body* of the message. Therefore, it is respectfully submitted that the cited passage does not anticipate the invention as presented in amended Claim 24.

Claim 32, as amended, is an independent claim including limitations similar to those of amended Claim 1, as discussed above. Therefore, it is respectfully submitted that the arguments present above regarding the allowability of

amended Claim 1 over Anderson are also applicable to Claim 32. For at least these reasons, Applicants respectfully submit that amended Claim 32 overcomes the art of record.

Claims 33 and 34, as amended, each depend either directly or indirectly from and therefore include the limitations of amended claim 32. Accordingly, it is respectfully submitted that each of these claims is also patentable over the art of record for at least the reasons set forth above with respect to claim 32. Further, each of these dependent claims places additional limitations on their parent and intermediate claims which, when considered in light of claim 32, further distinguish the claimed invention from the art of record.

Claims 35 and 36, as amended, are independent claims including limitations similar to those of amended Claim 1, as discussed above. Therefore, it is respectfully submitted that the arguments present above regarding the allowability of Claim 1 over Anderson are also applicable to Claims 35 and 36. For at least these reasons, Applicants respectfully submit that amended Claims 35 and 36 overcome the art of record.

Claims 37 and 38, as amended, each depend either directly or indirectly from and therefore include the limitations of amended claim 36. Accordingly, it is respectfully submitted that each of these claims is also patentable over the art of record for at least the reasons set forth above with respect to claim 36. Further, each of these dependent claims places additional limitations on their parent and intermediate claims which, when considered in light of claim 36, further distinguish the claimed invention from the art of record.

Claim 39, as amended, is an independent claim including limitations similar to those of amended Claim 1, as discussed above. Therefore, it is respectfully submitted that the arguments present above regarding the allowability of Claim 1 over Anderson are also applicable to Claim 39. For at least these reasons, Applicants respectfully submit that amended Claim 39 overcomes the art of record.

Claims 40-42, as amended, each depend either directly or indirectly from and therefore include the limitations of amended claim 39. Accordingly, it is respectfully submitted that each of these claims is also patentable over the art of record for at least the reasons set forth above with respect to claim 39. Further, each of these dependent claims places additional limitations on their parent and intermediate claims which, when considered in light of claim 39, further distinguish the claimed invention from the art of record.

Claim 62, as amended, is an independent claim including limitations similar to those of amended Claim 1, as discussed above. Therefore, it is respectfully submitted that the arguments present above regarding the allowability of Claim 1 over Anderson are also applicable to Claim 62 at least to the extent that the limitations of claim 1 are reflected by claim 62. For at least these reasons, Applicants respectfully submit that amended Claim 62 overcomes the art of record.

Claim 63 depends directly from and therefore includes the limitations of amended claim 62. Accordingly, it is respectfully submitted that claim 63 is also patentable over the art of record for at least the reasons set forth above with respect to claim 62. Further, this dependent claims places additional limitations on claim 62 which, when considered in its light, further distinguish the claimed invention from the art of record.

Claim 68 is an independent claim including limitations similar to those of amended Claim 1, as discussed above. Therefore, it is respectfully submitted that the arguments present above regarding the allowability of Claim 1 over Anderson are also applicable to Claim 68. For at least these reasons, Applicants respectfully submit that amended Claim 68 overcomes the art of record.

Claims 73 and 74, as amended, are independent claims including limitations similar to those of amended Claim 1, as discussed above. Therefore, it is respectfully submitted that the arguments present above regarding the allowability of Claim 1 over Anderson are also applicable to Claims 73 and 74. For at least these reasons, Applicants respectfully submit that amended Claims 73 and 74 overcome the art of record.

Hence, it is respectfully submitted that all of remaining Claims 1-12, 14-19, 23-27, 32-42, 62-63 and 73-74 overcome the Examiner's 35 U.S.C. §102(b) rejections over Anderson. Therefore, Applicants respectfully request the passage of these Claims to allowance.

**Regarding the 35 U.S.C. §103 Rejections over Anderson in view of Bandini et al.**

In the present Office Action, the Examiner rejected remaining Claims 28-29, 43-61, 64-67 and 69-72 under 35 U.S.C. §103(a) as being unpatentable over Anderson in view of Bandini et al. (U.S. Pat. Appl. No. 2002/0199095; hereinafter, Bandini). Specifically regarding Claims 43-61, 64-67 and 69-72, in addition to the same assertions made regarding the aforesubmitted original Claims 1, 32, 35, 41, 63, 73 and 74, the Examiner further asserts that Anderson discloses additional auxiliary servers. The Examiner further relies on Bandini for teachings regarding the location of enhancement configuration within a firewall in order to "reduce the number of SPAM messages received by users of a protected e-mail network." Applicants respectfully disagree with the Examiner's assertion at least for reasons discussed immediately hereinafter.

First referring to Claim 43, amended Claim 43 is an independent claim including limitations similar to those of amended Claim 1, as discussed above. Therefore, it is respectfully submitted that the arguments present above regarding the allowability of Claim 1 over Anderson are also applicable to Claim 43. Furthermore, it is respectfully submitted that Bandini adds nothing to the teachings of Anderson regarding the limitations presented in Claim 43. In particular, Bandini, in paragraphs [0010], [0011] and [0036] cited by the Examiner, merely teaches the filtering of received e-mail and the addition of a URL for reporting of received SPAM messages upon reception inside of a firewall. The present invention as taught in Claim 43, in contrast to the teachings of Bandini, discloses the combination of the use of locations inside and outside of a firewall for the addition of rich media content to an out-bound e-mail message for the production of an enhanced e-mail message. For at least these reasons, Applicants respectfully submit that Claim 43 overcomes the combination of art of record.

Claims 44-61 and 64 are independent claims including limitations similar to those of amended Claim 43, as discussed above. Therefore, it is respectfully submitted that the arguments present above regarding the allowability of Claim 43 over Anderson in view of Bandini are also applicable to Claims 44-61 and 64 at least to the extent that these independent claims reflect the limitations of Claim 43. For at least these reasons, Applicants respectfully submit that Claims 44-61 and 64 overcome the art of record in any reasonable combination.

Claim 65 depends directly from and therefore include the limitations of amended claim 64. Accordingly, it is respectfully submitted that each of these claims is also patentable over the art of record for at least the reasons set forth above with respect to claim 64. Further, each of these dependent claims places additional limitations on their parent and intermediate claims which, when considered in light of claim 64, further distinguish the claimed invention from the art of record.

Claim 66, as amended, is an independent claim including limitations similar to those of amended Claim 43, as discussed above. Therefore, it is respectfully submitted that the arguments present above regarding the allowability of Claim 43 over Anderson in view of Bandini are also applicable to Claim 66. For at least these reasons, Applicants respectfully submit that amended Claim 66 overcomes the combination of art of record.

Claim 67 depends directly from and therefore include the limitations of amended claim 66. Accordingly, it is respectfully submitted that each of these claims is also patentable over the art of record for at least the reasons set forth above with respect to claim 66. Further, each of these dependent claims places additional limitations on their parent and intermediate claims which, when considered in light of claim 66, further distinguish the claimed invention from the art of record.

Claim 69 depends directly from and therefore include the limitations of amended claim 68. Accordingly, it is respectfully submitted that each of these claims is also patentable over the art of record for at least the reasons set forth above with respect to claim 68. Further, each of these dependent claims places additional limitations on their parent and intermediate claims which, when considered in light of claim 68, further distinguish the claimed invention from the art of record.

Claim 70, as amended, is an independent claim including limitations similar to those of amended Claim 43, as discussed above. Therefore, it is respectfully submitted that the arguments present above regarding the allowability of Claim 43 over Anderson in view of Bandini are also applicable to Claim 70. For at least these reasons, Applicants respectfully submit that amended Claim 70 overcomes the combination of art of record.

Claim 71 depends directly from and therefore include the limitations of amended claim 70. Accordingly, it is respectfully submitted that each of these claims is also patentable over the art of record for at least the reasons set forth above with respect to claim 70. Further, each of these dependent claims places additional limitations on their parent and intermediate claims which, when considered in light of claim 70, further distinguish the claimed invention from the art of record.

Claim 72, as amended, is an independent claim including limitations similar to those of amended Claim 43, as discussed above. Therefore, it is respectfully submitted that the arguments present above regarding the allowability of Claim 43 over Anderson in view of Bandini are also applicable to Claim 72. For at least these reasons, Applicants respectfully submit that amended Claim 72 overcomes the combination of art of record.

Regarding amended Claims 28 and 29, it is noted that these claims depend indirectly from amended claim 1. Initially, it is submitted that Bandini contributes nothing to the rejection of claim 1 under section 102, as discussed above. Further, it is submitted that claims 28 and 29 place additional limitations on their parent and intermediate claims which further distinguish these claims over the art of record.

For example, in the context of making out the subject rejections under section 103, the Examiner states that Anderson discloses one or more rich media templates to serve as additional content (column 3, lines 55-58) and relies on Bandini in paragraph [0031] for teachings regarding the recording of a tag in a database. Applicants respectfully submit that Anderson, in the cited passage, simply suggests the potentiality of "complex' documents (i.e., those which contain non-textual information and/or representational structure)". Additionally, it is submitted that neither Anderson nor Bandini, either individually or in any reasonable combination, specifies that such "complex" documents include instructions for displaying specified rich media content, as provided in amended Claim 28, or suggests the addition of an

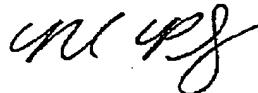
insertion tag for identifying an insertion point into the rich media template, as provided in amended Claim 29. For at least these reasons, Applicants respectfully submit that amended Claims 28 and 29 overcome the art of record in any reasonable combination.

**Conclusion**

Consequently, it is respectfully submitted that all of the Examiner's objections regarding the remaining claims have been overcome and that the application is in condition for allowance. Hence, allowance of these remaining claims and passage to issue of the application are solicited.

If the Examiner has any questions concerning this case, the Examiner is respectfully requested to contact Michael Pritzkau at 303-410-9254.

Respectfully submitted,



Michael M. Pritzkau  
Reg. No. 37,913